

Exhibit 4

Plaintiffs' Proposed Questions for the Venire Panel

PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS

1. Does any member of the panel know or know of any of the following:
 - [parties]
 - [lawyers]
 - [witnesses]
2. This case involves a senior housing facility in Conroe, Texas called Woodhaven Village.
 - Does anyone know a person who has ever resided at Woodhaven Village?
 - Has anyone ever been to Woodhaven Village?
 - Has anyone ever visited the web site for Woodhaven Village?
 - Does anyone know about or have you heard about Woodhaven Village?
3. In our system, the jury will be asked to hear the evidence from witnesses and documents and decide what evidence to believe and what evidence not to believe. Is there anyone on this panel who has any moral, philosophical, religious reason that you would not be able to judge the credibility or the believability of the witnesses who testify in this trial?
4. This lawsuit involves copyright law. Is there anyone here who has a problem or a concern about the fact that some things are protected by copyright?
5. This lawsuit is about copyrights in building designs and architectural plans and drawings. Is there anyone who thinks that, while you might agree that copyright law is appropriate, you don't think that building designs or architectural plans are deserving of copyright protection?
6. Is there anybody on this panel who has been -- worked as an architect or a home designer or have you worked in that business?

7. Has anyone worked in the construction industry where the buildings that you helped build were built from architectural plans and drawings?

8. Has anyone worked in the real estate development business where the developments that you worked on involved architectural plans and drawings?

9. Has anyone worked in the real estate finance business where the financing you did involved architectural plans and drawings?

10. Has anyone worked as a realtor or broker in the real estate business?

11. For all of those businesses, whether it's architects and home designers, realtors, homebuilders, developers, other real estate firm -- and I'm not limiting this to people who have worked in that business -- has anybody ever had an experience with one of those businesses or those professionals that would make you not be able to be a fair and impartial juror on this case without having heard any of the evidence in this case?

12. One of the things the jury will be asked to decide in this case is whether there was copying of the Plaintiff's architectural designs. The law is that this can be proven by direct evidence and also by what we call circumstantial evidence. Is there anyone who will not be able to consider circumstantial evidence in deciding copying or any other issues in this case?

13. Another issue the jury may have to decide is that, if the jury finds that there has been infringement, the copyright owner can recover the profits any defendants made that are attributable to the infringement. Is there anyone who has a problem with that concept, that if someone infringes another person's copyright, that the copyright owner can recover the profits from the infringer?

14. In connection with that, in the system, in writing the copyright law, Congress split the burden of proving these profits. The copyright owner has to prove what the defendants' gross revenues were from the infringement and each defendant has to prove any expenses or other things that the defendant says should be deducted from the revenue. Is there anyone on this panel who has a problem with that way that the law was

written, to say that one side has the burden of proving revenues and the other side has the burden of proving any deductions?